

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 1 1-1.2

Requested of Company Representative: Nancy Wittebort

Company: Ameritech Illinois

Date Submitted: 2/06/01

Reference No.: ICC Docket 01-0007

Data Request on Docket 01-0007

OFFICIAL FILE

I.C.C. DOCKET NO. 01-0007

Stagg Exhibit No. 3

Witness \_\_\_\_\_

Date 3-9-01 Reopened CLC

Please provide the requested information on or before February 12, 2001 according to the following directions:

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**RWM 1.1** Verizon Petition for Arbitration page 12 Issue 1 RESTRICTION ON INTERCONNECTION AT TECHNALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING:

SBC states that its tandems are in a state of exhaust and it cannot accommodate additional connectivity at it tandems. This is the second time tandem exhaustion has been mentioned by SBC in a Docketed proceeding.

- a). Please define and explain the meaning of "Premature Tandem Exhaustion"
- b) Please indicate if "Premature Tandem Exhaustion" and "Full Tandem Exhaustion" are the same thing.
- c) Please indicate if Premature/Full Tandem Exhaustion is referring to Switch Exhaustion or Facility Exhaustion.

- d) Please indicate when Premature/Full Tandem Exhaustion occurs.
- e) Please explain and give a pictorial drawing where Premature/Full Tandem Exhaustion occurs.
- f) Please indicate if SBC is close to Premature/Full Tandem Exhaustion and is comment on the state of the SBC tandems in Illinois and indicate if the tandem switch near capacity.
- g) Please indicate if the networks, that the tandem utilize to connect to other tandems and end offices ,are at capacity
- h) Please explain, if SBC experiences Tandem Exhaustion , does it force the wireless carriers to do the work of the tandem switch and bear those costs.
- i) Please indicate if SBC has committed to trunking direct from its end offices to the interconnecting network switches at any predetermined traffic level.
- j) Please indicate if Tandem Exhaustion is only an issue in Illinois or is it a problem for SBC. in other regions.
- k) Please describe SBC's long range plans to ease or eliminate Premature/Full Tandem Exhaustion. and explain what needs to be added or upgraded to prevent tandem exhaust from occurring.

**RWM 1.2** In Verizon's Petition for Arbitration on page 12 Issue 1:  
**RESTRICTION ON INTERCONNECTION AT TECHNALLY FEASIBLE POINTS,**  
 Item A. DIRECT TRUNKING: SBC's position states "SBC has claimed that unless Verizon Wireless agrees to trunk directly to any SBC end office once the traffic reaches 500 CCS from the entire Verizon Wireless network during the busy hour, it would result in unacceptable congestion at its tandems."

- a) Please define what is meant by the entire Verizon Wireless network.
- b) Please specify if the 500 CCS is measured from the Verizon Wireless MTSO (Mobile Transmission Switching Office) to a specific SBC tandem or is the measurement made to a specific end office through the SBC tandem.

Provide copies of Ameritech's Responses to:

Russell Murray  
Telecommunications Division  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, Illinois 62701  
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Nora A. Naughton  
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Suite C800  
Chicago, Illinois 60601  
(312) 793-2877

RESPONSE

**Illinois Commerce Commission  
Docket 01-0007  
Staff Data Request RWM 1.1**

**Request:**

Verizon Petition for Arbitration page 12 Issue 1 RESTRICTION ON INTERCONNECTION AT TECHNICALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING:

SBC states that its tandems are in a state of exhaust and it cannot accommodate additional connectivity at it tandems. This is the second time tandem exhaustion has been mentioned by SBC in a Docketed proceeding.

- a) Please define and explain the meaning of "Premature Tandem Exhaustion".
- b) Please indicate if "Premature Tandem Exhaustion" and "Full Tandem Exhaustion" are the same thing.
- c) Please indicate if Premature/Full Tandem Exhaustion is referring to Switch Exhaustion or Facility Exhaustion.
- d) Please indicate when Premature/Full Tandem Exhaustion occurs.
- e) Please explain and give a pictorial drawing where Premature/Full Tandem Exhaustion occurs.
- f) Please indicate if SBC is close to Premature/Full Tandem Exhaustion and comment on the state of the SBC tandems in Illinois and indicate if the tandem switch is near capacity.
- g) Please indicate if the networks, that the tandem utilize to connect to other tandems and end offices are at capacity
- h) Please explain, if SBC experiences Tandem Exhaustion, does it force the wireless carriers to do the work of the tandem switch and bear those costs.
- i) Please indicate if SBC has committed to trunking direct from its end offices to the interconnecting network switches at any predetermined traffic level.
- j) Please indicate if Tandem Exhaustion is only an issue in Illinois or is it a problem for SBC in other regions.
- k) Please describe SBC's long range plans to ease or eliminate Premature/Full Tandem Exhaustion. and explain what needs to be added or upgraded to prevent tandem exhaust from occurring.

**Response:**

Ameritech Illinois assumes that the reference to SBC in the data request was intended as a reference to Ameritech Illinois. Ameritech Illinois is an incumbent local exchange carrier in Illinois whose ultimate parent is SBC Communications Inc., which is not a local exchange carrier. It is Ameritech Illinois' network that can experience tandem exhaust.

- a) Tandem exhaust or full tandem exhaust occurs when the trunk terminations on a tandem switch are fully utilized and no additional capacity can be added to the tandem switch. See direct testimony of Samuel Way. Premature tandem exhaust is the exhaust of a tandem prior to the date it is expected to exhaust based on projected network demand.
- b) Premature and full tandem exhaust are not the same thing. While premature and full tandem exhaust refer to the same condition (full utilization of all trunk terminations on the tandem switch), premature exhaust refers to a more specific situation: where tandem exhaust occurs prior to the forecast date. Thus, while premature tandem exhaust is, by definition, full tandem exhaust, full tandem exhaust need not be premature.
- c) Premature/Full Tandem Exhaust refers to the exhaust of the trunk terminations on the tandem switch.
- d) As noted above, tandem exhaust occurs when the trunk terminations on a tandem are fully utilized and no additional capacity can be added to the tandem switch.
- e) See responses to (a), (b), (c), and (d) above.
- f) See direct testimony of Samuel Way.
- g) See direct testimony of Samuel Way.
- h) No, Ameritech Illinois does not force the wireless carriers to do the work of the tandem switch and bear those costs. Before tandem exhaust actually occurs, Ameritech Illinois takes steps to alleviate the condition as explained in the direct testimony of Samuel Way.
- i) When Ameritech Illinois delivers traffic to Verizon Wireless, it generally does so not from its end office switches but from its tandem switches; while Verizon Wireless may have an interest in the point at which the traffic is delivered to Verizon Wireless, Ameritech Illinois believes that Verizon Wireless is (and should be) indifferent as to the routing of the traffic within Ameritech Illinois' network before the hand-off. Accordingly, Ameritech Illinois assumes that Staff means to ask whether Ameritech Illinois has committed to trunking direct from its network (as opposed to from its end offices) to Verizon Wireless' switches at any predetermined traffic level. Ameritech Illinois also assumes that Staff is inquiring about the existence of any Ameritech Illinois commitment (as opposed to any SBC commitment). SBC Communications Inc., the ultimate parent company of Ameritech Illinois, is not itself a local exchange carrier and will not be a party to the interconnection agreement being arbitrated here.

With those clarifications, the answer is that Ameritech Illinois has neither made nor been asked to make a commitment to trunk direct to any particular point on Verizon Wireless' network. The only switches on Verizon Wireless' network are MTSOs, and Ameritech Illinois now trunks its traffic to those MTSOs and is willing to continue to trunk all of its traffic to those MTSOs – without regard to any predetermined traffic level. Ameritech Illinois is also willing, however, to commit to delivering its traffic to Verizon Wireless at Verizon Wireless' cell sites (although the cell sites are not switches), rather than to Verizon Wireless MTSOs – again without regard to any predetermined traffic level.

- j) Tandem exhaust is an issue not only in Illinois but also in other states in which the incumbent local exchange carrier is owned by SBC Communications Corp.
- k) See direct testimony of Samuel Way.

**Illinois Commerce Commission**  
**Docket 01-0007**  
**Staff Data Request RWM 1.2**

**Request:**

In Verizon's Petition for Arbitration on page 12 Issue 1: RESTRICTION ON INTERCONNECTION AT TECHNALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING: SBC's position states "SBC has claimed that unless Verizon Wireless agrees to trunk directly to any SBC end office once the traffic reaches 500 CCS from the entire Verizon Wireless network during the busy hour, it would result in unacceptable congestion at its tandems."

- a) Please define what is meant by the entire Verizon Wireless network.
- b) Please specify if the 500 CCS is measured from the Verizon Wireless MTSO (Mobile Transmission Switching Office) to a specific SBC tandem or is the measurement made to a specific end office through the SBC tandem.

**Response:**

- a) The entire Verizon Wireless network is defined as any traffic that Verizon Wireless would send Ameritech Illinois from its MTSOs that transits the tandem destined for a particular office.
- b) The measurement is made to a specific end office.

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 2.1-2.3

Requested of Company Representative: Nancy Witterbort

Utility Company: Ameritech Illinois

Date Submitted: 02/15/01 Reference No.: ICC Docket 01-0007

Please provide the requested information on or before February 21, 2001 according to the following directions:

- A. Answer each request on a separate sheet of paper
  - B. At the top of each sheet of paper reprint the request to which the response applies.
  - C. Provide the name, job title and telephone number of the person responsible for the content of the response.
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**RWM 2.1**

**Issue 1:** RESTRICTION ON INTERCONNECTION AT TECHNICALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING: (Verizon Petition for Arbitration page 12)

SBC's position states: "SBC has claimed that unless Verizon Wireless agrees to trunk directly to any SBC end office once the traffic reaches 500 CCS from the entire Verizon Wireless network during the busy hour, it would result in unacceptable congestion at its tandems."

Samuel Way of Ameritech states in his Direct Testimony:(answer to Question 7) "Verizon Wireless should establish direct trunking to an Ameritech Illinois end office when Verizon Wireless sends the equivalent of one DS1 of traffic to that end office".

Please indicate if the 500 CCS's mentioned in the Verizon Petition for Arbitration is equal to 24 trunks or 1 DS-1 referenced in Ameritech's answer to Question 7.



**RWM 2.2**

Staff's Data Request RWM1.2.b states "Please Specify if the 500 CCS is measured from the Verizon Wireless MTSO(Mobile Transmission Switching Office) to a specific SBC tandem or is the measurement made to a specific end office."

Ameritech response was "The measurement is made to a specific end office".

If Verizon Wireless has traffic for a particular end office through the Ameritech tandem, please specify if the trunk group between the tandem and the end office is a common trunk group shared by everyone that has traffic between the end office and the tandem. If this is a shared common trunk group used by everyone, please indicate how Ameritech can determine what traffic is Verizon Wireless versus the other traffic.

**RWM 2.3**

- (a) Please indicate, when a trunk group is established to the end office instead of the tandem, what kind of trunk group is used. Please specify if this is a two way trunk group between the Verizon site and the end office or are they two one way trunk groups, one incoming to the end office from Verizon and the other outgoing from the end office to Verizon.
- (b) If a new trunk group is need between Verizon Wireless and Ameritech's end office, please indicate if Ameritech's end office would have to put in a new trunk group to Verizon.

**Illinois Commerce Commission**  
**Docket 01-0007**  
**Staff Data Request RWM 2.1**

**Request:**

Issue 1: RESTRICTION ON INTERCONNECTION AT TECHNICALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING: (Verizon Petition for Arbitration page 12)

SBC's position states: "SBC has claimed that unless Verizon Wireless agrees to trunk directly to any SBC end office once the traffic reached 500 CCS from the entire Verizon Wireless network during the busy hour, it would result in unacceptable congestion at its tandems."

Samuel Way of Ameritech states in his Direct Testimony (answer to Question 7):  
"Verizon Wireless should establish direct trunking to an Ameritech Illinois end office when Verizon Wireless sends the equivalent of one DS1 of traffic to that end office."

Please indicate if the 500 CCS's mentioned in the Verizon Petition for Arbitration is equal to 24 trunks or 1 DS-1 referenced in Ameritech's answer to Question 7.

**Response:**

The statement of "SBC's position" in the request does not accurately state Ameritech Illinois' position. Ameritech Illinois' position, as set forth in the response to the petition and in Mr. Way's direct testimony, is that Verizon Wireless should establish direct trunking to an Ameritech Illinois end office when Verizon Wireless sends the equivalent of one DS-1 of traffic to that end office. Further answering, Ameritech Illinois states that (a) one DS-1 is equivalent to 24 trunks, and (b) 500 CCSs is roughly equivalent to one DS-1, but that fact is irrelevant to this proceeding, because Ameritech Illinois' position, proposed contract language and testimony all speak in terms of trunks, and not in terms of CCSs.

**Illinois Commerce Commission**  
**Docket 01-0007**  
**Staff Data Request RWM 2.2**

**Request:**

Staff's Data Request RWM 1.2 b states "Please specify if the 500 CCS is measured from the Verizon Wireless MTSO (Mobile Transmission Switching Office) to a specific SBC tandem or is the measurement made to a specific end office."

Ameritech's response was "The measurement is made to a specific end office".

If Verizon Wireless has traffic for a particular end office through the Ameritech tandem, please specify if the trunk group between the tandem and the end office is a common trunk group shared by everyone that has traffic between the end office and the tandem. If this is a shared common trunk group used by everyone, please indicate how Ameritech can determine what traffic is Verizon Wireless versus the other traffic.

**Response:**

The trunk group between the tandem and the end office is a common trunk group. Ameritech Illinois measures what traffic belongs to Verizon Wireless using point code studies. However, the disagreement between Ameritech Illinois and Verizon Wireless does not center around the ability of Ameritech Illinois to measure this traffic. There is no disagreement between the parties about Ameritech Illinois' ability to quantify the traffic.

**Illinois Commerce Commission**  
**Docket 01-0007**  
**Staff Data Request RWM 2.3**

**Request:**

- (a) Please indicate, when a trunk group is established to the end office instead of the tandem, what kind of trunk group is used. Please specify if this is a two way trunk group between the Verizon site and the end office or are they two one way trunk groups, one incoming to the end office from Verizon and the other outgoing from the end office to Verizon.
- (b) If a new trunk group is needed between Verizon Wireless and Ameritech's end office, please indicate if Ameritech's end office would have to put in a new trunk group to Verizon.

**Response:**

- (a) Either two way or one way trunk groups may be established. The type of trunk group is determined on a case by case basis.
- (b) A new trunk group from Ameritech's end office to Verizon would not necessarily be required.

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 3.1-3.2

Requested of Company Representative: Nancy Wittebort

Company: Ameritech Illinois

Date Submitted: 3/02/01

Reference No.: ICC Docket 01-0007

Data Request on Docket 01-0007

Please provide the requested information on or before March 6, 2001 according to the following directions:

- A. Answer each request on a separate sheet of paper
  - B. At the top of each sheet of paper reprint the request to which the response applies.
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- 

**RWM 3.1** Verizon Petition for Arbitration page 12 Issue 1 RESTRICTION ON INTERCONNECTION AT TECHNALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING:

SBC states that its tandems are in a state of exhaust and it cannot accommodate additional connectivity at it tandems. This is the second time tandem exhaustion has been mentioned by SBC in a Docketed proceeding.

Ameritech's response to RWM 1.1(g) states, "See direct testimony of Samuel Way". Mr. Way's testimony was non-responsive to RWM 1.1(g). Therefore, please indicate if the networks, that the tandem utilize to connect to other tandems and end offices, are at capacity. (facility exhaustion)

**RWM 3.2** Ameritech Illinois' response to Verizon Wireless Petition for Arbitration Issue AIT-1 addresses "Trunk Side Interconnection". Please define and describe what

Ameritech means by "trunk side interconnection". How does "trunk side interconnection" pertain to POI?

Provide copies of Ameritech's Responses to:

Russell Murray  
Telecommunications Division  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, Illinois 62701  
Rmurray@icc.state.il.us

Nora A. Naughton  
Mary J. Stephenson  
160 North LaSalle Street  
Suite C800  
Chicago, Illinois 60601  
(312) 793-2877

**Illinois Commerce Commission**  
**Docket 01-0007**  
**Staff Data Request RWM 3.1**

**Request:**

Verizon Petition for Arbitration page 12 Issue 1 RESTRICTION ON INTERCONNECTION AT TECHNALLY FEASIBLE POINTS, Item A. DIRECT TRUNKING:

SBC states that its tandems are in a state of exhaust and it cannot accommodate additional connectivity at it tandems. This is the second time tandem exhaustion has been mentioned by SBC in a Docketed proceeding.

Ameritech's response to RWM 1.1(g) states, "See direct testimony of Samuel Way". Mr. Way's testimony was non-responsive to RWM 1.1(g). Therefore, please indicate if the networks, that the tandem utilize to connect to other tandems and end offices are at capacity. (facility exhaustion)

**Response:**

The facilities that connect to the tandems are nearing capacity. The current utilization is 82%. Ameritech Illinois witness Sam Way is prepared to explain at hearing why 82% utilization is correctly characterized as "nearing capacity."

The limiting factor, however, is not the network that the tandem utilizes to connect to other tandems and end offices, but the ability of each tandem to terminate enough interconnecting trunks for each associated tandem and end office. This ability diminishes as more tandems are added to the network.

Proprietary and Confidential

**Illinois Commerce Commission  
Docket 01-0007  
Staff Data Request RWM 3.2**

**Request:**

Ameritech Illinois' response to Verizon Wireless Petition for Arbitration Issue AIT-1 addresses "Trunk Side Interconnection". Please define and describe what Ameritech means by "trunk side interconnection". How does "trunk side interconnection" pertain to POI?

**Response:**

Trunk side interconnection refers to a central office switch interface that is capable of and has been programmed to treat the facility as connecting to another switching entity. A trunk side interface offers those transmission and signaling features appropriate for the connection of switching entities and cannot be used for the direct connection of ordinary telephone station sets. Point of Interconnection is the physical location at which two carriers networks meet for the purpose of establishing interconnection. A POI may be required with trunk side interconnection.



ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 4.1-

Requested of Company Representative: Haran Rashes

Company: Verizon Wireless

Date Submitted: 3/02/01

Reference No.: ICC Docket 01-0007

Data Request on Docket 01-0007

Please provide the requested information on or before March 6, 2001 according to the following directions:

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**RWM 4.1** Please provide a clarification on the following POI's that Verizon has stated in their Interconnection Agreement. They appear in the Interconnection Agreement on page 13, section 2.1.7 Interconnection Options.

- (a) Please define and describe Type 1, Type 2A or Type 2B interfaces.
- (b) Section 2.1.7.5 references Out-of-Band Signaling Transfer Points.  
Understanding what Quad Links are, please indicate if an interconnection agreement between the two companies is required to establish these links?
- (c) Section 2.1.7.6 Central Office Cross Connect Points, please define and describe where that point is in the central office.
- (d) Section 2.1.7.7 Points of Access to Unbundled Network Elements (UNE), please clarify and describe Verizon Wireless' position on this section.

Provide copies of Verizon Wireless' Responses to:

Russell Murray  
Telecommunications Division  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, Illinois 62701  
Rmurray@icc.state.il.us

Nora A. Naughton  
Mary J. Stephenson  
160 North LaSalle Street  
Suite C800  
Chicago, Illinois 60601  
(312) 793-2877

STATE OF ILLINOIS

BEFORE THE ILLINOIS COMMERCE COMMISSION

In the matter of Verizon Wireless	)	
Petition for Arbitration pursuant to	)	
Section 252 (b) of the Telecommunications	)	Docket No. 01-0007
Act of 1996 to establish an Interconnection	)	
Agreement with Illinois Bell Telephone	)	
Company d/b/a Ameritech Illinois	)	
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RESPONSES OF VERIZON WIRELESS TO  
THE DATA REQUESTS OF ILLINOIS COMMERCE COMMISSION STAFF

RWM 4.1

**Request:** Please provide a clarification on the following POI's that Verizon has stated in their Interconnection Agreement. They appear in the Interconnection Agreement on page 13, section 2.1.7 Interconnection Options.

- (a) Please define and describe Type 1, Type 2A or Type 2B interfaces.
- (b) Section 2.1.7.5 references Out-of-Band Signaling Transfer Points. Understanding what Quad Links are, please indicate if an interconnection agreement between the two companies is required to establish these links?
- (c) Section 2.1.7.6 Central Office Cross Connect Points, please define and describe where that point is in the central office.
- (d) Section 2.1.7.7 Points of Access to Unbundled Network Elements (UNE), please clarify and describe Verizon Wireless' position on this section.

**Response:**

- (a) **Type 1 interface:** This interface may be a trunk side or line side connection at a LEC end office. The most commonly used interface is a Type 1 trunk side connection with MF signaling. This may be a bi-directional service and use DID numbers associated with the trunk group and assigned to wireless end users. This service is often used in situations where there are a very few number of wireless subscribers and it is not wise use of number resources to assign an NXX to provide geographic identity for the wireless subscribers. Options include trunk with line treatment (TWLT) that supports recording and billing as if the calls were made over a line side connection.

Type 1 Variation is based upon a National ISDN arrangement. This connection is a line side ISDN connection in either Basic Rate Interface (BRI) which consists of 2 bearer channels of 64 kbps and a signaling channel, or Primary Rate Interface (PRI) at DS1 (1.544 mbps).

Both Type 1 interfaces are described in Bellcore Document GR-145-CORE Section 2.3 Type 1 Interconnection. Most LECs require a wireless carrier to have at least one Type 1 Connection in a LATA to terminate ancillary traffic (800, 411, Operator traffic) to the LEC.

**Type 2A:** A Type 2A Interface is a trunk side connection at the tandem for a wireless carrier. There are several variations depending upon signaling and areas of termination coverage. All Type 2A Interfaces allow termination to all end offices that subtend the tandem (some LECs in certain states allow LATA wide termination from a single designated LATA-wide tandem). Some LECs allow ancillary traffic to be terminated via a Type 2D option. The Type 2A Interface is described in detail in Bellcore Document GR-155-CORE in Section 2.4.

A common option for a Type 2A Interface is SS7 signaling. NXX blocks assigned to wireless carriers typically have Local Exchange Routing Guide (LERG) routing instructions to route land-to-mobile traffic through the 2A Interface. Most, if not all, wireless carriers terminate the bulk of their mobile-to-land traffic through a 2A Interface. There are few if any differences between a Type 2A Interface and a tandem connection used by a CLEC. One difference we are aware of is the LATA wide option offered by some LECs which does not appear to be offered to CLECs under the tandem connection.

**Type 2B:** A Type 2B Interface is simply the wireless version of an end office trunk side connection offered to CLECs. There are no differences that we are aware of between the two connections offered to the two types of carriers. Terminating mobile-to-land traffic is limited to NXXs that reside in the end office switch. Signaling may be either MF or SS7. The Type 2B Interface may be bi-directional and carry land-to-mobile traffic. This interface is described in detail in Bellcore Document GR-145-CORE Section 2.5

- (b) Since Ameritech has elected to charge usage for SS7, Verizon Wireless believes it must order SS7 as local interconnection in order to be able to receive reciprocal compensation or to have a "bill and keep" arrangement as Verizon Wireless and Ameritech have agreed to. It also seems logical that if Verizon Wireless is ordering local interconnection trunks that the signaling associated with those trunks should be covered under a local interconnection agreement. This also seems to be supported by the First Report and order which designates Signal Transfer Points as a "technically feasible point of interconnection."
- (c) Verizon Wireless' interpretation of central office cross connect points (as referenced in 47 CFR § 51.305) is that it is a generic term for points where an interconnecting party

may establish facility connectivity to the LEC network. Verizon Wireless believes this covers the Main Distributing Frame, Trunk Distributing Frame and digital cross connect systems, all of which may be located at any convenient point in the central office. There are other cross connect points described in the Order that do not reside in the central office, such as the Network Interface Device (NID) which is used to connect loop facilities to inside wiring.

- (d) The FCC defines UNEs as a "technically feasible point of interconnection", 47 CFR § 51.305. Verizon Wireless does not want to contractually preclude itself the option of interconnecting at a technically feasible point of interconnection.

Dated: March 6, 2001

Responded to by: John Clampitt